

**The OMB Supporting Statement for the
Rehabilitation Services Administration**

**Annual Progress Reporting Form
For the American Indian Vocational Rehabilitation Services
Program**

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Request for Clearance of Proposed Form

U. S. Department of Education Rehabilitation Services Administration Annual Progress Reporting Form For the American Indian Vocational Rehabilitation Services Program

A. Justification

1. Importance of the Information

The Rehabilitation Services Administration (RSA) of the U.S. Department of Education (ED) requests an extension of a currently approved collection form for which approval will be expiring on January 31, 2005. This is a web-based annual reporting form that is completed by grantees funded under the American Indian Vocational Rehabilitation Services (AIVRS) program, authorized under Section 121 of the Rehabilitation Act of 1973, as amended (Public Law 93-112).

The form collects data on grantees' program activities. RSA staff will use this information to respond to the annual report to Congress required by the Rehabilitation Act and the Education Department General Administrative Regulations (EDGAR) requirements, as well as to facilitate program planning efforts required under the Government Performance and Results Act (GPRA) of 1993 (Public Law 103-62).

This data collection supports the Rehabilitation Act that requires grantees to report on specifically identified activities and EDGAR, which outlines requirements that must be met by applicants and grantees. The regulatory requirements that apply to the RSA grant programs include 34 CFR Parts 75, 77, 80, 81, and 82. Specifically, 34 CFR 75.590 requires grantees to submit a performance report, or, for the last year of a project, a final report, that evaluates at least annually:

- (A) the grantee's progress in achieving the objectives in its approved application;
- (B) the effectiveness of the project in meeting the purposes of the program; and
- (C) the effect of the project on the participants being served by the project.

Additionally, RSA's GPRA plan, as part of ED's performance reporting requirements, must collect information to meet the following mandates: (a) implementation of a comprehensive plan that includes goals and objectives for the program, (b) measurement of the program's progress in meeting its objectives, and (c) submission of an annual report on program performance, including plans for program improvement, as appropriate. The FY2005 indicators for AIVRS that this data collection will address include:

Indicator 1.1

Number of “eligible” individuals who received services under an IPE.

Indicator 1.2

Number of “eligible” individuals who achieve employment outcomes.

Indicator 1.2b.

Number of “eligible” individuals, served under an IPE, who did not achieve employment outcomes.

Indicator 1.3

Percent of “eligible” individuals who leave the program with employment outcomes.

Form Questions

In order to provide the most accurate and comprehensive documentation of RSA’s activities, the form will collect information from the AIVRS grantees on the following areas:

1. Reporting period
2. Budget and narrative
3. Project goals
4. Project objectives
5. Consumers served
6. VR services
7. Special efforts
8. GPRA indicators
9. Outcomes
10. Interaction with State VR Agency
11. Evaluation
12. Consumer satisfaction
13. Success story (optional)
14. Comments (optional)

The sections of the form address the GPRA reporting requirements and the program and planning needs of the RSA staff. Appendix A contains a Microsoft WORD version of the form. To access the web-based form, use the following URL:

<https://rsa.ed.gov>.

The form requires the use of **federal_test** as a test PR/Award Number and **FeDs42** as a test password to enter the system.

Grantees will complete the progress form annually; data are due to RSA 45 days (November 15) after the end of each grantee’s reporting period. The reporting period for all grantees is October 1 – September 30.

Analysis

The reporting system will yield frequencies, cross tabulations, and other tabular displays of information to meet the needs of RSA staff, ED staff, and Congress under provisions of the Rehabilitation Act, EDGAR, and GPRA. RSA will prepare these reports according to statutory and regulatory requirements. RSA will prepare other data tabulations on an as-needed basis to meet specific information needs.

2. Purposes and Uses of the Data

RSA and ED will use the information gathered annually from these data collection efforts to comply with EDGAR and to provide Congress with the information mandated in the Rehabilitation Act and GPRA.

Data collected from the grantees will provide a national description of the types of programs Vocational Rehabilitation (VR) agencies and tribal agencies operate to serve the vocational rehabilitation needs of American Indians with disabilities. Grantees can use their own annual progress data as they discuss, plan, generate support for, and implement vocational rehabilitation programs and services for American Indians with disabilities. These data will provide information that policy makers can use in better understanding the barriers, opportunities, and outcomes involved in improving vocational rehabilitation services for American Indians with disabilities. RSA will also use these data in preparing its annual report to Congress required by the Rehabilitation Act.

3. Improved Information Technology

The type and amount of information to be collected from grantees under this extension is exactly the same to what is required under the currently approved form (OMB Form #1820-0655). The use of this web-based data collection form has significantly reduced grantee burden in the following ways:

- The format is user friendly and requires minimal narrative.
- During year one of a grant, a grantee will enter all relevant project information. In subsequent grant years, the system will provide grantees with previously entered data, allowing them to make the necessary edits to this previously entered data. Grantees will never have to re-enter data from year to year, as was required in past years when paper forms were in use.
- The web system permits grantees to enter information on an ongoing basis during the reporting period, thereby, giving grantees the option to use the system for their internal management purposes without having to spend their own resources to develop such a tool.

The system will total all numeric entries for an end-of-the year report.

The system, uses ColdFusion version 4.5 and SQL Server version 7. A primary advantage of using this type of dynamic database is the immediate access RSA staff will have to

the information grantees submit. Not only will RSA staff be able to identify, almost instantly, which grantees have submitted their completed forms (via the Internet), they can also generate reports, even on partial data, as requested by Congress or ED. The system can be programmed to send electronic mail messages to all grantee project directors prior to the due date of the annual reports. Electronic messages can also be sent to grantees that do not submit their reports on time.

The System complies with Federal Accessibility standards implementing Section 508 for Internet Applications, Part 36 CFR 1194.22, thus assuring full access to users with disabilities.

4. Efforts to Identify Duplication

This form does not duplicate items from any other RSA data collection efforts for this program.

5. Methods Used to Minimize Burden on Small Entities

No small entities will be part of this data collection.

6. Consequences of Not Collecting the Information

The proposed data collection activity involves an annually required Congressional report and progress form from RSA American Indian grantees. If the information is not collected, data on key aspects of these programs for American Indians with disabilities will not be available; consequently, RSA would be unable to meet statutory and regulatory requirements for collection and reporting of data on grantees' activities and outcomes.

7. Departures from Guidelines in 5 CFR 1320.5

The proposed data collection is consistent with guidelines set forth in 5 CFR 1320.5.

8. Consultations outside the Agency

While developing the data collection instrument in this clearance package, RSA staff solicited input from the AIVRS project directors (Winter 2001) to determine clarity of the questions on an initial draft of the form and what problems respondents might have in providing the requested information. Grantees had the option of recommending changes to the form. In January 2002, RSA and RTI staff participated in a conference call with AIVRS grantees that provided grantees with another opportunity to comment on the form. RTI staff collected all grantee comments from these two efforts and summarized the grantee comments for RSA. RSA provided RTI with their revisions to the form. RTI incorporated RSA's revisions to the form into a second version that was used with four grantees who pretested the form in Spring 2002. (Details of the pretest are included in Section B4 of this clearance package.)

9. Payments or Gifts to Respondents

No payments or gifts are to be provided to respondents.

10. Assurances of Confidentiality

Two levels of system security will be in place to assure confidentiality of data obtained via the Internet. In order to prevent the general public from accessing the system, grantees' Federal award numbers (PR numbers) will be pre-loaded into the Internet data collection system. Secondly, unique passwords will be sent under separate cover to each grantee following OMB clearance. Grantees must enter their Federal award number (PR number) and unique password to enter the web site and input their data. These two security measures will also ensure that individual grantees cannot obtain access to any other grantees' reporting form via the Internet. Additionally, only RSA-identified Federal staff will be given access to the system's database to view and generate reports.

11. Sensitive Questions

The questions included in the form are not considered sensitive.

12. Estimates of Response Burden

The number of grantees funded under the AIVRS Program will vary from year to year; however, all grantees will be required to submit an annual progress reporting form. Based on previous year reporting, grantees needed an average of 16 hours to complete the reporting form. The cost to respondents is estimated to be \$20 per hour for a total cost to respondents of about \$320. This hourly rate estimate is based on previous year reporting.

13. Estimates of Cost Burden for Collecting Information

This is an annual progress reporting form. There are no capital costs and no equipment purchases are necessary.

14. Estimate of Annualized Cost to the Federal Government

RSA is hosting and maintaining the report web site and reporting system on ED's server. The annualized cost of operating the system is estimated to be \$5,500 in FY 2005.

15. Changes in Burden

None: there are no changes in burden.

16. Tabulation and Analysis Plan and Schedule

RSA staff will use the information collected from the annual progress reporting form to report annually to Congress and for program monitoring purposes. RSA will generate standard reports to meet requirements of the Rehabilitation Act, EDGAR, and GPRA.

17. Display Expiration Date for OMB Approval

The three-year expiration date for OMB approval will be displayed on the Internet version of the form and hard-copy versions.

18. Exceptions to Certification Statement

There are no exceptions to the certification statement.

B. Statistical Methods

1. Respondent Universe

No statistical methods will be used for this data collection, as all RSA grantees will be asked to complete the progress form. In fiscal year 2005, RSA is estimating 70 respondents.

2. Sample Design

None: the data collection will be a universe annual reporting requirement.

3. Methods for Maximizing the Response Rate

Grantees are required as a condition of their grant to complete an annual progress form. RSA will provide technical assistance to grantees, as needed, in completing the form. Reminder messages of the due date will be posted on the web site, at least one month before the due date and at weekly intervals until the due date. The web system can generate a list of grantees that have not completed their forms by the due date. Email messages will be sent to those sites asking for their completed forms as soon as possible. Telephone calls will be made to all grantees who do not complete their forms within two weeks after the due date.

4. Tests of Procedures and Methods

In addition to the input RSA obtained from grantees previously described in Section A8 of this clearance package, four AIVRS grantees participated in a one-day site visit by RTI staff to discuss their current data collection methods, review the form question by question to identify any items that were unclear or data that might be difficult to collect, and make suggestions for changes to the form and its accompanying instruction manual. RTI staff also demonstrated the use of a similar RSA web-based reporting form (Special Projects and Demonstrations) and answered grantee questions about the use of this type of reporting mechanism. Overall, these grantees reported that using a web-based form will facilitate their data collection and reporting to RSA. They universally liked the fact that the web form could be completed in stages and believed that having an electronic copy of the previous year's form would be beneficial.

RTI provided RSA with a summary of the comments from the participating grantees. The types of revisions grantees wanted involved clearer language and more specific instructions and examples. All grantees stated they currently collect the majority of data requested on the

proposed new reporting form and that the proposed form would not place unrealistic data collection demands on their staff; they indicated no barriers to collecting the data. A few items on the form will require various grantees to tailor internal reporting procedures to obtain the requested data. One project director said that the standardization of the form would serve as a tool to assist them in streamlining their data collection methods.

RSA staff reviewed the grantee suggestions for changes to the form and the instruction manual and asked RTI to make the necessary changes. The form contained in this clearance request (Appendix A) is that revised form.

5. Consultations on Statistical Aspects of the Design

None was needed because no statistical methods were used in the design of the form.

APPENDIX A

ANNUAL PROGRESS REPORTING FORM WORD Version

For the American Indian Vocational Rehabilitation Services Program